

REMARKS

1. Reconsideration and further prosecution of the above-identified application are respectfully requested in view of the amendments and discussion that follows. Claims 1-21 are pending in this application.

The specification and drawings have been objected to. Claims 1-5, 8-12, 15-16 and 18 have been rejected under 35 U.S.C. §102(e) as being anticipated by U.S. Pat. No. 6,792,086 to Saylor et al. Claims 6, 13, 17 and 20-21 have been rejected under 35 U.S.C. §103(a) as being obvious over Saylor et al. in view of U.S. Pat. No. 6,829,348 to Schroeder et al. Claims 7, 14 and 19 have been rejected under 35 U.S.C. §103(a) as being obvious over Saylor et al. in view of U.S. Pat. No. 6,356,633 to Armstrong. After a careful review of the claims, it has been concluded that the rejections are improper and the rejections are therefore traversed.

2. The specification and drawings have been objected to. In response, a proposed FIG. 1 is included that changes reference number 34 to 35. The specification has also been amended to include the DB reference and reference numbers 30, 35, 38, 40, 42, 44, 3a, 7a, 10a and 14a.

3. Claims 1-5, 8-12, 15-16 and 18 have been rejected as being anticipated by Saylor et al. In response, independent claims 1, 8, 15, 20 and 21 have been further limited to "a call center of the organization" and "the call center providing the determined answer to the caller". Support for the further limitation may be found at page 3,

lines 10-15.

Independent claims 1, 8, 15, 20 and 21 have also been further limited to the method steps of (and apparatus for) "the call center receiving a first call and assigning the first call to a live agent". Support for multiple contacts between customers and live agents may be found on page 7, lines 8-19).

In contrast, Saylor et al. does not have any live agents. In addition, Saylor et al. fails to provide any purpose to be served by any live agents.

It may be noted next that the claims are limited to the method step of (and apparatus for) "forming an answer to the translated query within an artificial intelligence engine of the call center". In contrast, "Prior art interactive voice response units (IVRs) have generally lacked the intelligence to answer questions and have typically been limited to menu presentation and to detection of menu selection" (specification, page 4, lines 6-8). In addition, Saylor et al. explicitly states that "Choice interpretation module 42 . . . uses voice-to-text conversion, natural language interpretation and/or artificial intelligence to determine which of the available menu options the user desires" (Saylor et al. col. 19, lines 50-53). The selection of menu options (as under Saylor et al.) is an entirely different methodology than forming answers (as under the claimed invention).

The Examiner asserts that "A user calls a call processing center, and said call center processes an information request . . . This information is disseminated by an organization whose purpose is commerce-related (Column 3 Lines 36-41, Column 5 Lines 41-42 and 55). The user may ask a business related question (Column 17 Lines

13-16)" (Office Action of 3/24/05, page 4). However, as amended, the claims are no longer limited to the enterprise activities of any organization; instead, the claims are now limited to the enterprise activities of the organization using the call center.

The references within Saylor et al. to enterprise activities provided by the Examiner refer to information requests for the location of nearby restaurants. However, there is no indication that the Saylor et al. voice network is operated by any restaurant. As such the references are inapposite to the subject matter of the claimed invention.

For any of the above reasons, Saylor et al. does not do the same, or any similar, thing as that of the claimed invention. Since Saylor et al. does not do the same, or any similar, thing as that of the claimed invention, the rejections are believed to be improper and should be withdrawn.

4. Claims 6, 13, 17 and 20-21 have been rejected as being obvious over Saylor et al. in view of Schroeder et al. However, Schroeder et al. (as with Saylor et al.) fails to provide any teaching or suggestion of an artificial intelligence engine that forms an answer within the artificial intelligence engine rather than merely selecting menu items. Since the combination of Saylor et al. and Schroeder et al. fails to teach or suggest at least this claim limitation, the rejections are believed to be improper and should be withdrawn.

5. Claims 7, 14 and 19 have been rejected as being obvious over Saylor et al. in view of Armstrong. However, Armstrong (as with Saylor et al.) fails to provide any

teaching or suggestion of an artificial intelligence engine that forms an answer within the artificial intelligence engine rather than merely selecting menu items. Since the combination of Saylor et al. and Armstrong fails to teach or suggest at least this claim limitation, the rejections are believed to be improper and should be withdrawn.

6. Allowance of claims 1-21, as now presented, is believed to be in order and such action is earnestly solicited. Should the Examiner be of the opinion that a telephone conference would expedite prosecution of the subject application, he is respectfully requested to telephone applicant's undersigned attorney.

Respectfully submitted,
WELSH & KATZ, LTD.

By 

Jon P. Christensen

Registration No. 34,137

May 3, 2005
WELSH & KATZ, LTD.
120 South Riverside Plaza
22nd Floor
Chicago, Illinois 60606
(312) 655-1500